



ESPP, Brussels, 5.9.2018

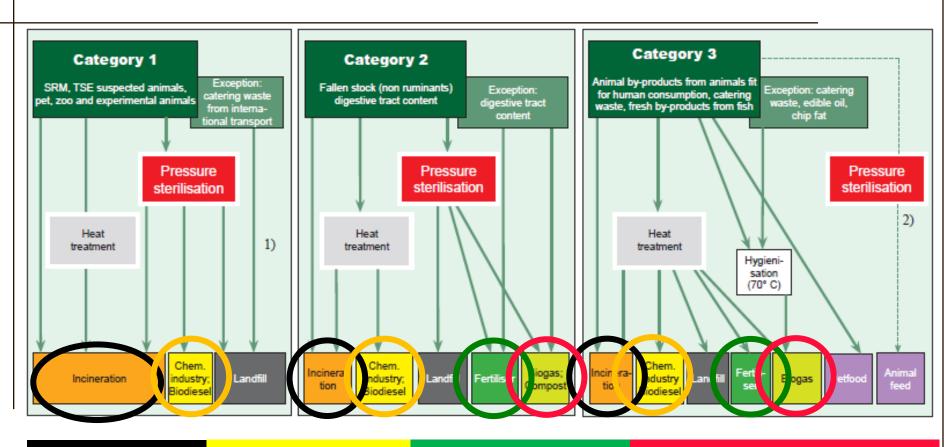
# How the Fertilisers Regulation will interact with the Animal By-Products Regulation

Dr. Martin Alm
EFPRA





# Where do we produce fertiliser?



**Ashes** 

**Glycerin** 

**MBM/PAP** 

**Digestate/Compost** 





# **ABP-Regulation: starting and end points**

- The ABPR defines starting and end point for ABPs which fall under the ABPR.
- There are no end points for feeding and fertilising purpose
- Any ABP and any derived product destined for feed or fertiliser stays under veterinary control
- This approach does not comply with new fertiliser reg.





### **Solution**

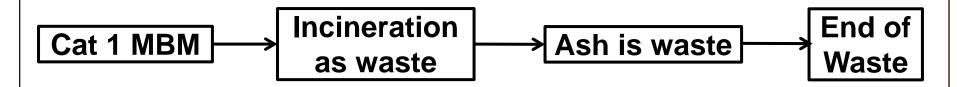
- Article 45: Amendments to Regulation (EC) No 1069/2009
- In Regulation (EC) No 1069/2009, Article 5 is amended as follows:
- (1) in paragraph 2, the first subparagraph is replaced by the following: "For derived products referred to in Articles 32, 35 and 36 which no longer pose any significant risk to public or animal health, an end point in the manufacturing chain may be determined, beyond which they are no longer subject to the requirements of this Regulation.";
- For every single derived product Commission will request an EFSA opinion.
- Question to EFSA? Is the use safe without any veterinary control (compared to the control today) of the last step i.e. distribution?



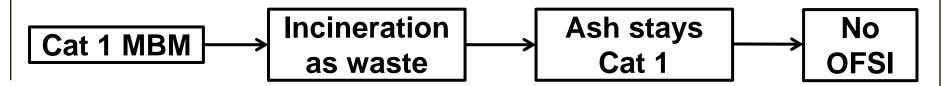


### **Ashes**

- STRUBIAS report revealed Commission's stand point on ashes:
- EFPRA's view:



Commission's view:







# **Open questions**

- Why is ash still an ABP?
- Why is ash (minerals) still considered as an "organic fertiliser" and therefore forbidden as fertiliser?
- "Incineration as waste" is the highest and safest disposal. Why should remaining ash stay under ABP?
- No risk assessment that ash from Cat 1 MBM poses a risk.
- For many years Cat 1 MBM ashes are in the focus of P recycling projects.
- We do not question whether Cat 1 should be used as OFSI!
   We question whether ash must be considered as Cat 1!





# Solution e.g. in Portugal

Article 36: <u>Placing on the market of other derived products</u>
Operators may place on the market derived products (...) provided:

(a) those products are:

(i) not intended for use for the feeding to farmed animals or <u>for</u> <u>application to land from which such animals are to be fed;</u> or (...)

Ashes are allowed as organic fertiliser in forests only!





### Market outlook

- MBM from Cat 2 and PAP from Cat 3 provide N, P and organic substance
- Market is more or less stable
- There is no need / benefit to incinerate them first (loss of N and organic substance)
- No cat 2 or 3 ashes in the near future





# Thank you very much for your attention!